

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION**

JEVON ECTOR,)	
on behalf of herself and all others)	
similarly situated,)	
)	
Plaintiff,)	07 C 6116
)	
v.)	
)	
CITY OF MARKHAM,)	Judge Grady
)	Magistrate Judge Ashman
Defendant.)	

**PLAINTIFF'S MOTION TO STAY THE BRIEFING SCHEDULE
AND SET THIS MATTER FOR SETTLEMENT CONFERENCE**

Plaintiff Jevon Ector, by and through her attorneys, moves this Court for an order staying the briefing schedule on her Response to Defendant's Motion to Dismiss Plaintiff's Complaint and setting this matter for settlement conference. In support of her motion, Plaintiff states as follows:

1. On January 30, 2008, Plaintiff filed her Unopposed Motion To Extend Briefing Schedule on Defendant's Motion to Dismiss Complaint, which was set for presentment on February 20, 2008 at 9:30 a.m. *See Exhibit A.*
2. In this Motion, Plaintiff requested that she be granted up to March 4, 2008 to file her Response to Defendant's Motion pending the parties' settlement discussions.
3. However, on February 20, 2008, Plaintiff's counsel discovered that this Motion was required to be re-noticed pursuant to this Court's instructions located on its website.
4. Given that the parties have met and exchanged documents relating to Plaintiff's individual and class claims, and that the settlement discussions are continuing, as opposed to re-noticing Plaintiff's previous motion requesting additional time to file her Response pending

settlement discussions, Plaintiff requests that the briefing schedule be stayed altogether and that this matter be set for a settlement conference before this Court.

5. Plaintiff's counsel believes that this Court's participation in such discussions would better serve to lead this case to a resolution.

6. To that end, and in order to avoid an unnecessary increase in attorney's fees in a fee-shifting case, Plaintiff requests that this Court stay the briefing schedule on Defendant's Motion to Dismiss pending the outcome of the requested settlement conference.

WHEREFORE, Plaintiff Jevon Ector respectfully requests that this Court stay the briefing schedule on Defendant's Motion to Dismiss and set this case for a settlement conference in front of this Court.

Respectfully Submitted,

By: /s/ Lance A. Raphael
One of Plaintiff's Attorneys

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